

### REMARKS

Claims 1-28 are pending in the present application. Reconsideration of the claims is respectfully requested.

#### **I. 35 U.S.C. § 102, Anticipation**

The examiner has rejected claims 1-3, 5-7, and 9-28 under 35 U.S.C. § 102(e) as being anticipated by Lou et al., U.S. Patent Number 6,216,158, 04/10/2001, filed 01/25/1999, "System and Method Using a Palm Sized Computer to Control Network Devices", hereinafter referred to as *Luo*. This rejection is respectfully traversed.

As to claims 1-3, 5-7, and 9-28, the office action states:

Referring to claims 1, 11, 15, 19, 23, 25, and 27, Lou reference discloses a hub (fig. 1 and col. 11, lines 62-64); and a plurality of computing devices in physical proximity with the hub (fig. 1); wherein each of the plurality of computing devices communicates with the hub via a wireless connection (col. 5, lines 57-65); the hub receives and retransmits requested documents between selected computing devices (col. 3, 2<sup>nd</sup> paragraph); each of the plurality of computing devices translates each requested document into a system independent language prior to transmitting the requested document to the hub (col. 5, lines 9-21); and each of the plurality of computing devices translates each received document from the hub (col. 6, lines 53-57).

Referring to claims 2, 14, 18, and 22, Lou reference discloses the system independent language is a Java based language (col. 2, lines 53-58).

Referring to claims 3, 13, 17, and 21, Lou reference discloses the system independent language is an extensible markup language (col. 2, lines 41-47).

Referring to claims 5-7, and 10, Lou reference discloses wherein at least one of the plurality of computing devices is a personal digital assistant (col. 1, lines 13-16); wherein at least one of the plurality of computing devices is a laptop computer (col. 1, lines 23-25); wherein at least one of the plurality of computing devices is portable (col. 1, lines 13-16); and transmissions between each of the plurality of computing devices and the hub are radio frequency transmissions (fig. 1, palm sized computer 100).

Referring to claims 9, 12, 16, 20, 24, 26, and 28, Lou reference discloses transmissions between each of the plurality of computing devices and the hub are infrared transmissions (col. 5, lines 57-65); the strength of the wireless communication signal is such that only devices in close proximity with each other may receive the signal, thus ensuring that only authorized recipients receive information conveyed via the wireless

communication signal (col. 5, lines 57-65). It should be understood that when you use the infrared transmission rate is roughly the same transmission rates as traditional parallel ports. The only restrictions on their use is that the two devices must be within a few feet of each other and there must be a clear line of sight between them.

Office Action dated November 5, 2002, pages 2-3.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983).

*Luo* does not teach all elements of claims 1, 11, 15, 19, 23, 25, and 27.

Claim 1 reads as follows:

1. A system for providing dynamically shared documents, comprising:
  - a hub; and
  - a plurality of computing devices in physical proximity with the hub;wherein each of the plurality of computing devices communicates with the hub via a wireless connection;
  - the hub receives and retransmits requested documents between selected computing devices;
  - each of the plurality of computing devices translates each requested document into a system independent language prior to transmitting the requested document to the hub; and
  - each of the plurality of computing devices translates each received document from the hub.

Claim 11 reads as follows:

11. A method in a data processing system for retrieving documents from other data processing systems, comprising the steps of:
  - sending, from a first data processing system, a request, in a system independent language, for a shared document from a second data processing system to a hub in close proximity to the first and second data processing systems via a wireless communication signal;
  - receiving, from the hub, via the wireless communication link, the shared document, formatted in the system independent language; and

translating the shared document from the system independent language into a first data processing system preferred data format for presentation to a user.

Claims 15 and 19 are independent claims similar to claim 11.

Claim 23 reads as follows:

23. A method in a data processing system for facilitating communications between a plurality of other data processing systems, comprising the steps of:  
receiving a request in a system independent format from a first data processing system via a wireless communication link;  
broadcasting the request to a second data processing system via the wireless communication link;  
receiving an answer in a system independent format from the second data processing system via the wireless communication link; and  
broadcasting the answer to the first data processing system via the wireless communication link.

Claims 25 and 27 are independent claims similar to claim 23.

The "hub" recited in the claims refers to a centralized relay device, wherein the "hub" receives and sends requests and shared documents in a system independent language from a first data processing system via a wireless communication signal to a second data processing system via a wireless communication signal. For example, in Figure 1 from the specification, laptop computer 108 may send a request in a system independent language to hub 102 for a shared document from PDA 110. Responsive to receiving the request, hub 102 sends the request to PDA 110. Then, hub 102 receives the shared document in a system independent language from PDA 110. Once the shared document is received, hub 102 sends the shared document in a system independent language to laptop computer 108.

In the rejection of a system for providing dynamically shared documents comprising a hub as recited in claim 1, the Office Action refers to the following portion of *Luo*:

Switches, hubs, routers, and other networking devices are candidates for a control device 200.

*Luo*, column 11, lines 62-64.

*Luo* does not teach using a "hub" as a relay device as in the presently claimed invention. The "hub" referred to in *Luo* is a control device rather than a relay device that receives and retransmits requested documents between select computing devices. The word "hub" does not appear in any other portions of *Luo*. The "hub" in *Luo* is referring to a control device, which is the end machine controlling the services it requires.

In the rejection of the hub receives and retransmits requested documents between selected computing devices as recited in claim 1, the Office Action refers to the following portion of *Luo*:

A control application is as an application that relies on resources located off of the control device (e.g. on a network), but uses a control device to initiate and control the application. The resources are accessed and controlled, but not resident, on the control device. Examples of such compute/memory-intensive services include PowerPoint slide presentations and speech recognition systems. These services can be both invoked and controlled via a control device.

*Luo*, column 3, lines 11-19 (2<sup>nd</sup> paragraph).

*Luo* does not teach or suggest that the hub receives and retransmits requested documents between selected computing devices. In *Luo*, the control device transmits commands it generates from user input rather than receiving and retransmitting requested documents between selected computing devices. *Luo* teaches that the control device accesses and controls resources that are not resident on the control device. Services are invoked and controlled via a control device similar to a remote control.

With respect to the claimed feature of each of the plurality of computing devices translating each requested document into a system independent language prior to transmitting the requested document to the hub, the Office Action refers to the following portion of *Luo*:

Returning to the specific example of the PowerPoint presentation, FIG. 3 illustrates the architecture that could be used to implement such a system. In FIG. 3, the control device 200 has been replaced with a palm sized computer 100 executing the Palm OS 301. The GUI 212 is specifically for PowerPoint control (see FIG. 1 for an example of such a GUI). The Java Virtual Machine 318 is executing on the palm sized computer 100 and replaces the middleware 218. The middleware protocol manager 216 supports Jini discovery, lookup and download protocols. PowerPoint control commands are issued to the network based

computer service 250. The PowerPoint control protocol manager 364 provides the interface for these commands and controls the PowerPoint application 368.

*Luo*, column 5, lines 9-21.

*Luo* does not teach or suggest that each of the plurality of computing devices translates each requested document into a system independent language prior to transmitting the requested document to the hub, as is recited in the claims. *Luo* teaches that the control device executes middleware, such as Java Virtual Machine, and a control protocol manager provides an interface for commands to control an application. In *Luo*, user input is translated into commands to control an application, in a similar fashion to a remote control sending commands to a television. Additionally in *Luo*, the control device translates user input into specific **commands** rather than having each of the plurality of computing devices translate requested **documents** into a **system independent language**.

Also, in the presently claimed invention, the hub itself does **not** translate the requested documents since the translation occurs “prior to transmitting the requested document to the hub”. *Luo* teaches that the control device translates the user input into commands rather than that each of the plurality of computing devices translates each requested document into a system independent language prior to transmitting the requested document to the hub, as is recited in the claims.

With respect to the claimed feature that each of the plurality of computing devices translates each received document from the hub as recited in the claims, the Office Action refers to the following portion of *Luo*:

An important element of the control application 210 is a GUI front-end which accepts user input for controlling the PowerPoint presentation (or other application) and a control protocol manager backend which takes user input and translates it into commands to the CPU service.

*Luo*, column 6, lines 53-57.

As recited in the claims, each of the plurality of computing devices translates each received document from the hub. Each document received from the hub is translated from a system independent language to the preferred format of the computing device. *Luo* does not teach or suggest that each of the plurality of computing devices translates each received document from the hub. *Luo*

teaches that a control protocol manager backend in the control device translates user input into **commands** to the CPU service rather than that each of the plurality of computing devices translates each received **document** from the hub, as is recited in the claims. Again, the control device of *Luo* does not implement the features of the hub in the presently claimed invention.

Additionally, *Luo* does not teach two separate translations as in the presently claimed invention. The claims of the present invention recite that a requested document is translated into a system independent language prior to transmitting to requested document to the hub. A second translation occurs when the each of the plurality of computing devices receives the requested document from the hub. The hub receives and sends documents that are already in a system independent language. Each of the plurality of computing devices performs two different types of translations. The first translation is to translate a requested document into a system independent language and the second translation is to translate a received document from the system independent language into its preferred format.

Furthermore, claims 11, 15, and 19 recite translating the shared document from the system independent language into a first data processing system preferred data format for presentation to a user. The shared document is displayed by the first data processing system to the user. *Luo* does not teach or suggest this feature. Additionally with respect to claims 23, 25, and 27, *Luo* does not teach or suggest a wireless relay between two wireless links.

Thus, *Luo* does not teach or suggest all of the features as recited in claims 1, 11, 15, 19, 23, 25, and 27 of the present invention.

Since claims 2-3, 5-7, 9-10, 12-14, 16-18, 20-22, 24, 26, and 28 depend from claims 1, 11, 15, 19, 23, 25, and 27, the same distinctions between *Luo* and the claimed invention exist for these claims. Consequently, it is respectfully urged that the rejection of claims 2-3, 5-7, 9-10, 12-14, 16-18, 20-22, 24, 26, and 28 has been overcome.

Therefore, the rejection of claims 1-3, 5-7, and 9-28 under 35 U.S.C. § 102 has been overcome.

Furthermore, *Luo* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. *Luo* is directed toward an entirely different problem than the presently claimed invention because it teaches a system and method using a palm sized computer to control network devices as opposed to providing dynamically shared documents to multiple computing devices as in the presently claimed invention. Absent some teaching or incentive to implement *Luo* and providing dynamically shared documents to multiple computing devices, one of ordinary skill in the art would not be led to modify *Luo* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Luo* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

## II. 35 U.S.C. § 103, Obviousness

The examiner has rejected claim 4 under 35 U.S.C. § 103(a) as being unpatentable over *Lou* in view of *Sopko*, U.S. Patent Number 6,003,068, 12/14/1999, filed 02/14/1997, "Method and Apparatus for Portably Providing Shared Removable Resources to a Plurality of Computing Devices". This rejection is respectfully traversed.

Since claim 4 depends from claim 1, the same distinctions between *Luo* and the claimed invention exist for claim 4. Neither *Lou* individually nor *Lou* in view of *Sopko* teach or suggest all of the features recited in claim 4. Consequently, it is respectfully urged that the rejection of claim 4 has been overcome.

The examiner has rejected claims 8 and 10 under 35 U.S.C. § 103(a) as being unpatentable over *Lou* in view of *Koperda*, U.S. Patent Number 5,790,806, 08/04/1998, filed 04/03/1996, "Cable Data Network Architecture". This rejection is respectfully traversed.

Since claims 8 and 10 depend from claim 1, the same distinctions between *Luo* and the claimed invention exist for claim 8 and 10. Neither *Lou* individually nor *Lou* in view of *Koperda* teach or suggest all of the features recited in claims 8 and 10. Consequently, it is respectfully urged that the rejection of claims 8 and 10 have been overcome.

Therefore, the rejection of claims 4, 8, and 10 under 35 U.S.C. § 103 has been overcome.

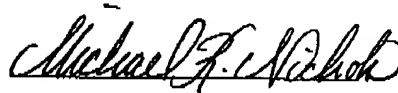
### III. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 30 January 2003

Respectfully submitted,



Michael R. Nichols  
Reg. No. 46,959  
Carstens, Yee & Cahoon, LLP  
P.O. Box 802334  
Dallas, TX 75380  
(972) 367-2001  
Attorney for Applicants